



1919 McKinney Ave., Dallas, TX 75201
Frontier.com

SENT VIA ELECTRONIC MAIL

September 30, 2024

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Re: Frontier's Response to Frontier North – Williams, Maxwell, Princeton, Colusa, Arbuckle, Grimes, Guinda, Knights Landing, and Robbins Audit Report.

Dear Rickey Tse,

Frontier California Inc (U-1002-C) and Citizens Telecommunications Company of California Inc. d/b/a Frontier Communications of California (U1024-C) collectively referred to as ("Frontier") hereby responds to the California Public Utilities Commission (Commission) audit data request regarding the Frontier North – Williams, Maxwell, Princeton, Colusa, Arbuckle, Grimes, Guinda, Knights Landing, and Robbins wire centers Communications Infrastructure Provider (CIP) audit conducted April 15, 2024, to April 19, 2024.

I. Records Review

- Frontier's facilities statistics.
- Frontier Facility Maps for each Wire Center.
- Frontier's General Order (GO) 95 and GO 128 inspection programs.
- Frontier's inspector training program.
- Patrol and detailed-inspection records for the last five years.
- Work order records for overhead and underground Frontier facilities for the last five years.
- Third Party Safety Hazard notifications for the last five years.
- Pole loading and safety factor calculations completed in the last twelve months.
- Intrusive pole tests conducted in the last three years.
- New construction projects completed in the last twelve months.

II. Records Violations

ESRB observed the following violations during the records review portion of the audit:

1. General Order (GO) 95, Rule 18-B1(a): Maintenance Programs, states in part:

“The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

- (i) Level 1 -- An immediate risk of high potential impact to safety or reliability:*
 - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
- (ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
 - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*
- (iii) Level 3 -- Any risk of low potential impact to safety or reliability:*
 - *Take corrective action within 60 months subject to the exception specified below.”*

ESRB’s review of Frontier’s tickets from February 2019 through February 2024 found that Frontier had 72 late-pending tickets and 23 late-closed tickets. Late-pending tickets are pending tickets that have not been completed by their assigned due date based on their hazard level, and late-closed tickets are tickets that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 95 late tickets by hazard level, including the total number of late tickets, as well as late-pending and late-closed tickets, which are included in the total.

Table 1: Late Tickets

Hazard Level	Total Late Tickets	Late-Pending Tickets	Late-Closed Tickets
1	1	-	1
2	94	72	22
3	-	-	-
Total	95	72	23

Response: Frontier has prioritized the 72 late pending tickets with a target completion date of November 15, 2024.

2. GO 128, Rule 17.2, Inspection states in part:

“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules.”

Frontier Inspection Maintenance Procedure (January 2024) states in part:

“GO 128 requires communications systems to be “inspected by the operator frequently and thoroughly” to ensure that they are in “good condition.” GO 128, Rule 17.2. Frontier California complies with this requirement.

Frontier California has regular Manhole T-Zone inspections, which requires that Field Technicians examine the entire manhole for defects.”

Frontier did not provide any underground patrol or inspection records for the period of February 2019 through February 2024. Therefore, Frontier is not in compliance with GO 128, Rule 17.2 and Frontier Inspection Maintenance Procedure which require frequent and thorough inspections. Frontier needs to update its procedures indicating required patrol and inspection time intervals to ensure that all its underground communication facilities are subject to the required inspections per GO 128, Rule 17.2.

Response: Frontier’s Inspection Maintenance Procedure accurately depicts the manhole inspection process for complying with GO 128, Rule 17.2. Frontier conducts frequent and thorough underground inspections as part of the routine onsite process when a field team member accesses a manhole or handhole. Each instance includes thoroughly examining the manhole for defects. Frontier and industry competitors apply this onsite approach as opposed to scheduled inspections which can divert resources, cause community disruption for traffic control and be costly. Furthermore, under GO 128 rules, there is no obligation to create or maintain specific inspection records for GO 128 compliance. Any repair would follow the normal course of business and not be documented separately or tracked differently as a repair specific to a manhole or GO 128 inspections.

III. Field Inspection

IV. Field Inspection Violations

ESRB observed the following violations during the field inspection:

1. GO 95, Rule 31.1, Design, Construction and Maintenance states in part:

“Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.”

- 1.1. Frontier Pole at the rear of [REDACTED] in Colusa (Location 1) has a buried anchor.
- 1.2. Frontier Pole at the rear of [REDACTED] in Colusa (Location 2) has a damaged and open terminal.
- 1.3. Joint Pole [REDACTED] at [REDACTED] in Colusa (Location 4) has a damaged terminal.
- 1.4. Frontier's facilities need to be transferred to the new Joint Pole at [REDACTED] in Colusa (Location 7).
- 1.5. Joint Pole [REDACTED] located at [REDACTED] [REDACTED] in Arbuckle (Location 16) has a broken lashing wire at midspan. Frontier has a preexisting Ticket # 3374234 to repair the lashing wire.
- 1.6. Frontier Pole [REDACTED] located [REDACTED] [REDACTED] in Arbuckle (Location 22):
 - Is missing a terminal cover. Frontier has a preexisting Ticket # 3374227 to repair the terminal.
 - Is missing high-vis strips.
- 1.7. Frontier Pole [REDACTED] at the rear of [REDACTED] in Arbuckle (Location 24) is missing high-vis strips.
- 1.8. Joint Pole at [REDACTED] in Williams (Location 33) is missing a terminal cover. Frontier has a preexisting Ticket # 3251661 to repair the terminal.
- 1.9. Frontier Pole at [REDACTED] in Williams (Location 36):
 - Has three bent pole steps.
 - Is missing high-vis strips.
- 1.10. Frontier Pole located at [REDACTED] [REDACTED] in Williams (Location 40) is missing high-vis strips.
- 1.11. Frontier Pole located at GPS coordinates [REDACTED] [REDACTED] in Williams (Location 41) is missing high-vis strips.
- 1.12. Frontier Pole [REDACTED] at [REDACTED] in Williams (Location 43) is missing high-vis strips.
- 1.13. Frontier Pole at [REDACTED] in Maxwell (Location 58) is missing high-vis strips.

- 1.14. Frontier Pole [REDACTED] at [REDACTED] in Maxwell (Location 60) is missing high-vis strips.
- 1.15. Frontier Pole located [REDACTED] in Colusa (Location 87) is leaning more than 10%.
- 1.16. Joint Pole at [REDACTED] in Colusa (Location 93) is missing high-vis strips.
- 1.17. Joint Pole located at [REDACTED] [REDACTED] in Colusa (Location 102) is leaning more than 10%.
- 1.18. Joint Pole located at [REDACTED] [REDACTED] in Colusa (Location 103) is leaning more than 10%.
- 1.19. Frontier's facilities need to be transferred to the new PG&E Pole at [REDACTED] in Grimes (Location 113).
- 1.20. Frontier Pole at [REDACTED] in Grimes (Location 114) is missing a high-vis strip.
- 1.21. Frontier's facilities need to be transferred to the new PG&E Pole at [REDACTED] in Grimes (Location 119). Frontier has a preexisting Ticket #2162171 to transfer its facilities.
- 1.22. Frontier Pole [REDACTED] at [REDACTED] in Knights Landing (Location 129) has a split pole top reinforced with a zip-tie. The pole requires a proper metal brace as reinforcement.

Response: Tickets have been issued to correct the noted violations. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

2. GO 95, Rule 86.2, Guys, Use states in part:

"Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."

- 2.1. Frontier Pole located at GPS coordinates [REDACTED] [REDACTED] in Colusa (Location 3) has a slack down guy.
- 2.2. Joint Pole [REDACTED] at [REDACTED] in Arbuckle (Location 25) has a slack down guy. Frontier has a preexisting Ticket # 3221471 to repair the guy.

- 2.3. Frontier Pole [REDACTED] located [REDACTED] in Williams (Location 42) has a broken down guy.
- 2.4. Frontier Pole [REDACTED] at [REDACTED] in Maxwell (Location 63) has a slack down guy. Frontier has a preexisting Ticket # 3028455 to adjust the guy.
- 2.5. Joint Pole at [REDACTED] in Princeton (Location 76) has a broken down guy. Frontier has a preexisting Ticket #3239656 to replace the guy.
- 2.6. Joint Pole located at [REDACTED] in Princeton (Location 78) has a slack down guy. Frontier has a preexisting Ticket #3025358 to adjust the guy.

Response: Tickets have been issued to correct the noted violations. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

3. GO 95, Rule 31.6, Abandoned Lines states:

"Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use."

- 3.1. There are abandoned Frontier lines hanging down Joint Pole # CPN1210 at [REDACTED] in Colusa (Location 4).
- 3.2. There were abandoned Frontier lines hanging down the Frontier Pole located at [REDACTED] in Arbuckle (Location 17). Frontier removed the lines during the audit.
- 3.3. There is an abandoned Frontier line hanging down the Frontier Pole at [REDACTED] in College City (Location 18).
- 3.4. There is an abandoned Frontier line on the ground at Frontier Pole # [REDACTED] at [REDACTED] in College City (Location 19).

- 3.5. There is an abandoned Frontier line hanging down the Joint Pole, [REDACTED], located at [REDACTED] in College City (Location 20).
- 3.6. There is an abandoned Frontier line at the Joint Pole at [REDACTED] in Arbuckle (Location 27).
- 3.7. There is an idle Frontier line on the ground at Frontier Pole # CPU912 at [REDACTED] in Williams (Location 34).
- 3.8. There is an abandoned Frontier line at the Frontier Pole at [REDACTED] in Williams (Location 36).
- 3.9. There is an abandoned Frontier line at the Joint Pole at [REDACTED] in Williams (Location 37). Frontier has a preexisting Ticket # 3357241 to remove the line.
- 3.10. There is an abandoned Frontier line on the ground at Frontier Pole # CPN1568 at [REDACTED] in Williams (Location 43). Frontier has a preexisting Ticket # 3221476 to remove the line.
- 3.11. There is an abandoned Frontier line midspan near the Joint Pole at [REDACTED] in Williams (Location 46).
- 3.12. There is an abandoned Frontier line at the Joint Pole [REDACTED] in Williams (Location 47).
- 3.13. There is an abandoned Frontier line hanging down the Joint Pole at [REDACTED] in Delevan (Location 68).
- 3.14. There is an abandoned Frontier line at the Joint SmartMeter Pole at [REDACTED] in Princeton (Location 73).
- 3.15. There is an abandoned Frontier line at the Joint Transformer Pole at [REDACTED] in Princeton (Location 74).
- 3.16. There is an abandoned Frontier line at the Joint Pole located at [REDACTED] in Grimes (Location 115). Frontier has a preexisting Ticket #3257508 to remove the line.
- 3.17. There is an abandoned and leaning Frontier Pole at [REDACTED] in Knights Landing (Location 135).

Response: Tickets have been issued to correct the noted violations. See

attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

4. GO 95, Rule 35, Vegetation Management states in part:

"Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule."

- 4.1. There is vegetation strain on Frontier service drops near the Frontier Pole across from [REDACTED] in Colusa (Location 5).
- 4.2. There is vegetation strain on a Frontier line near the Frontier Pole located [REDACTED] in Arbuckle (Location 17).
- 4.3. There is vegetation strain/abrasion on a Frontier line near the Frontier Pole at [REDACTED] in Williams (Location 35).
- 4.4. There is vegetation strain/abrasion on a Frontier line at the Joint Pole at [REDACTED] in Williams (Location 45).
- 4.5. There is vegetation strain on a Frontier line near Joint Pole # CPU489 at [REDACTED] in Maxwell (Location 57).

- 4.6. There is vegetation strain/abrasion on a Frontier line at [REDACTED] in Maxwell (Location 62).
- 4.7. There is vegetation causing strain/abrasion on a Frontier line at the Frontier Pole at [REDACTED] in Princeton (Location 82).
- [REDACTED] There is vegetation on a Frontier line causing it to be low at the Frontier Pole at [REDACTED] in Colusa [REDACTED]
- 4.9. There is vegetation abrasion on a Frontier line causing a broken lashing wire near the Joint Pole at [REDACTED] in Colusa (Location 89).

Response: Tickets have been issued to correct the noted violations. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

5. GO 95, Rule 86.9, Guy Marker (Guy Guard) states:

"A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."

- 5.1. Joint Pole, [REDACTED] in Arbuckle (Location 11) has a broken guy guard.
- 5.2. Joint Pole at [REDACTED] in Williams (Location 47) is missing a guy guard.
- 5.3. Frontier Pole [REDACTED] in Maxwell (Location 59) is missing a guy guard.
- 5.4. Frontier Pole [REDACTED] in Maxwell (Location 63) is missing a guy guard.
- 5.5. Frontier Pole at [REDACTED] in Princeton (Location 70) is missing a guy guard.

Response: Tickets have been issued to correct the noted violations. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

6. GO 95, Rule 44.3 Replacement states:

“Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades “A” and “B” construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade “C” construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade “C” construction that only support communication lines shall also conform to the requirements of Rule 81.3–A. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one.”

- 6.1. Frontier Pole located at [REDACTED] in Arbuckle (Location 17) is decayed. Frontier has a preexisting Ticket # 3374228 to replace the pole.
- 6.2. Frontier Pole located at [REDACTED] in Williams (Location 40) is decayed and damaged.
- 6.3. Frontier Pole located at [REDACTED] in Williams (Location 41) is decayed and damaged.
- 6.4. Joint Pole at [REDACTED] in Williams (Location 46) is decayed, damaged, and missing a chunk near the top of the pole.
- 6.5. Frontier Pole at [REDACTED] in Williams (Location 48) is deteriorated and rotted at its base. Frontier has a preexisting Ticket # 3221480 to replace the pole.
- 6.6. Frontier Pole at [REDACTED] in Williams (Location 52) is rotted and missing a chunk at its base.
- 6.7. Frontier Pole at [REDACTED] in Princeton (Location 72) is deteriorated and has a significant crack at the pole top.
- 6.8. Joint Pole at [REDACTED] in Colusa (Location 90) is missing a chunk. Frontier has a preexisting Ticket #2773848 to repair the pole.
- 6.9. Frontier Pole at [REDACTED] in Colusa (Location 94) is damaged and decayed. Frontier has a preexisting Ticket #3218253 to replace the pole.

6.10. Frontier Pole # [REDACTED] in Colusa (Location 101) is decayed and cracked. Frontier has a preexisting Ticket #3357243 to replace the pole.

Response: Tickets have been issued to correct the noted violations. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

7. GO 95, Rule 84.7-A, Climbing Space states in part:

"The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–A5."

7.1. The climbing space is obstructed at Frontier Pole [REDACTED] in College City (Location 19).

7.2. The climbing space is obstructed at the Joint Pole at [REDACTED] in Williams (Location 38). Frontier has a preexisting Ticket # 3251668 to trim the tree.

7.3. The climbing space is obstructed at Frontier Pole [REDACTED] in Maxwell (Location 56).

7.4. The climbing space is obstructed at the Joint Pole located [REDACTED] in Princeton (Location 81). Frontier has a preexisting Ticket #3343370 to trim the tree.

7.5. The climbing space is obstructed at the Frontier Pole located [REDACTED] in Colusa (Location 87).

Response: Tickets have been issued to correct the noted violations. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

8. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1 Case 6 Column B states:

"The minimum required vertical clearance of communication conductors above walkable surfaces on buildings is 8 feet."

The clearance is low between the Frontier service drop and building near Frontier Pole [REDACTED] in Arbuckle (Location 22).

Response: Ticket #TK3560742 been issued to correct the noted violation. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

9. GO 95, Rule 91.3-C, Stepping states in part:

"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain."

9.1. Joint Pole at [REDACTED] in Williams (Location 33) is missing three steps.

9.2. Joint Pole at [REDACTED] in Williams (Location 38) has a low step.

9.3. Joint Pole located at [REDACTED] in Colusa (Location 103) has a low step.

9.4. Frontier Pole at [REDACTED] in Grimes (Location 114) has a low step.

Response: Tickets have been issued to correct the noted violations. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

10. GO 95, Rule 84.6-B, Ground Wires states in part:

"Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet."

Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8)."

Frontier Pole # [REDACTED] at [REDACTED] in Williams (Location 34) has an

exposed ground wire and broken ground molding.

Response: Ticket #TK3560769 been issued to correct the noted violation. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

11. GO 95, Rule 87.9-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground states:

"Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

- (a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4–A, or*
- (b) Non–metallic conduit or rigid U–shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8."*

Joint Pole at [REDACTED] in Williams (Location 44) has two risers that are not properly secured to the pole.

Response: Ticket # TK3560777 has been issued to correct the noted violation. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

12. GO 128, Rule 32.7, Covers states in part:

"Manholes, handholes, and subsurface equipment enclosures while not being worked in, shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them and arrangements shall be such that a tool or appliance shall be required for their opening and cover removal. (Also see Rule 17.8, and Appendix B, Figs. 9 and 17.)"

12.1. Pedestal at [REDACTED] (Location 50) has a loose cover that is too small for the cables inside.

12.2. Pedestal located at [REDACTED] in Delevan (Location 67) had a cover that was not properly closed. Frontier properly closed the pedestal during the audit.

12.3. Pedestal located at [REDACTED] in Meridian (Location 109) is missing a cover. Frontier has a preexisting Ticket #3331144 to install a cover.

12.4. Pedestal located at [REDACTED] in Grimes (Location 120) was open. Frontier installed the cover during the audit.

12.5. Pedestal located at [REDACTED] in Robbins (Location 123) has an oversized cover that is zip-tied on. Frontier Ticket #1395764 shows that repairs were completed at this pedestal; however, an oversized cover attached with zip-ties is not a proper repair.

12.6. Pedestal located at [REDACTED] in Knights Landing (Location 136) was missing a cover. Frontier installed the cover during the audit.

12.7. Pedestal located at [REDACTED] in Knights Landing (Location 137) is missing a cover. Frontier has a preexisting Ticket #1378327 to install a cover.

Response: Tickets have been issued to correct the noted violations. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

13. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 5 Column B states in part:

"The basic minimum allowable vertical clearance of a communication conductor and supply service drop in an above ground area accessible to pedestrians only is 10 feet."

Exception (Rule 84.4-A(3)) Accessible to Pedestrians Only: *Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet.*

13.1. Frontier Pole located at [REDACTED] in Delevan (Location 66) has a low service drop approximately 3 feet from the ground.

13.2. [REDACTED] in Colusa (Location 88) has a low line. Frontier has a preexisting Ticket # 2529643 to raise the line.

Response: Tickets have been issued to correct the noted violations. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

14. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

“Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.”

Pedestal located at [REDACTED] in Grimes (Location 122) has a faded ownership sign.

Response: Ticket #TK3562481 has been issued to correct the noted violation. See attachment “NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls”.

15. GO 128, Rule 43.3-C, Depths states in part:

“Communication cables shall be installed at a minimum depth below the surface under which they are located as follows except as provided in Rule 43.3-D:

(1) Sidewalks, Parkways and Private Property: 12 inches”

There is a Frontier underground cable on the ground going from the Pedestal at [REDACTED] (Location 124) to the Pedestal at [REDACTED] (Location 126). Frontier Ticket #1395293 states that the work to underground this cable was completed; however, ESRB staff observed the cable lying on the ground.

Response: Ticket #TK3562501 has been issued. See attachment “NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls”.

16. GO 128, Rule 17.1, Design, Construction and Maintenance states in part:

“Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.”

Pedestal located at [REDACTED] in Knights Landing (Location 137) has damaged wiring. Frontier has a preexisting Ticket #1378327 to repair the wiring.

Response: New ticket # TK3562503 has been issued. See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

V. Observations

ESRB staff observed the following third-party potential safety concerns during the field inspection:

GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities states in part:

"For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property..."

GO 95, Rule 18A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

"(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery.

The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO95.

Note: Each pole owner must be able to determine all other pole owners on poles it owns. Each pole owner must be able to determine all authorized entities that attach equipment on its portion of a pole."

- 1.1. Joint Pole [REDACTED] at [REDACTED] in Colusa (Location 4) has a Race fiber line with broken lashing wire.
- 1.2. Cable TV facilities need to be transferred to the new Joint Pole at [REDACTED] [REDACTED] in Colusa (Location 7).
- 1.3. Joint Pole at [REDACTED] in Williams (Location 47) has a loose PG&E secondary insulator.
- 1.4. SmartMeter Pole at [REDACTED] in Maxwell (Location 54) has an exposed ground rod.
- 1.5. [REDACTED] in Princeton (Location 75) has a loose bird diverter.
- 1.6. [REDACTED] located at [REDACTED] [REDACTED] in Colusa (Location 84) is leaning more than 10%. Frontier has a preexisting Third-Party Ticket #3343372.
- 1.7. [REDACTED] at [REDACTED] in Colusa (Location 97) is decayed and deteriorated.
- 1.8. Joint Pole at [REDACTED] in Colusa (Location 99) has a Cable TV service riser that is loose and missing a cover.
- 1.9. Joint Pole located at [REDACTED] [REDACTED] in Colusa (Location 104) has a broken Cable TV lashing wire at midspan.
- 1.10. [REDACTED] at [REDACTED] in Colusa (Location 105) is hollow at its base and significantly deteriorated.
- 1.11. [REDACTED] is contacting the span guy and Cable TV line on [REDACTED] in Colusa (Location 108).
- 1.12. Joint Pole located at [REDACTED] in Grimes (Location 115) has a split/broken PG&E secondary crossarm and loose PG&E secondary insulator.
- 1.13. Joint Pole located at [REDACTED] in Knights Landing (Location 131) has a slack PG&E down guy that is contacting communication span guys and lines.

1.14. [REDACTED] in Knights Landing
(Location 132) is missing chunks due to vehicles hitting it.

Response: See attachment "NORCAL CPUC NOTIFICATIONS Williams Colusa Grimes etc.xls".

If you have any questions, please do not hesitate to contact me at 214-724-7719, or
judy.geise@ftr.com

Sincerely,

/s/ Judy Geise
Manager, Regulatory
Frontier
judy.geise@ftr.com

Cc: Jenny Smith, Director Government and Regulatory Affairs, Frontier
Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Yi Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC